## WILMERHALE

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July 11, 2014

## VIA ECF

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York NY 10007-1312

Re: Amplify Education, Inc. v. Greenwood Publishing, Inc. d/b/a Heinemann Civil Action No. 1:13-cv-02687 (S.D.N.Y.)

Dear Judge Swain:

I write on behalf of Defendant-Counterclaim Plaintiff Greenwood Publishing, Inc. d/b/a Heinemann and Plaintiff-Counterclaim Defendant Amplify Education, Inc. to jointly request extensions of the deadlines under Local Patent Rule 12 (Claim Construction Briefing). The parties participated in a private mediation on July 10 and intend to continue discussions over the next several weeks. The parties therefore jointly request a 7-day extension to the deadline for filing the responsive claim construction briefs, and a 14-day extension to the deadline for filing the reply briefs. These extensions will not affect the date for the Markman hearing or any other deadlines in the case.

The new schedule would be as follows:

Event	<b>Current Due Date</b>	Proposed Due	
		Date	
Responsive Claim Construction Brief	July 21, 2014	July 28, 2014	
Reply Claim Construction Brief	July 28, 2014	August 11, 2014	

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If Your Honor finds the extension acceptable, the parties respectfully request that you so order this schedule and have it entered on the docket.

Sincerely,

/s/ Cosmin Maier

Cosmin Maier

cc: Counsel of Record